

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Bankr. No. 20-20081 JAD
RENEE R. KLINE,)	
)	Chapter 13
Debtor.)	
)	Docket No. 68
WILMINGTON SAVINGS FUND)	Related to Docket No. 1
SOCIETY, D/B/A CHRISTIANA)	
TRUST,)	
Movant,)	Hearing Date & Time:
)	
vs.)	Claim No. 8
)	
RENEE R. KLINE AND)	
RONDA J. WINNECOUR,)	
CHAPTER 13 TRUSTEE,)	
)	
Respondents.)	

DECLARATION OF MORTGAGE PAYMENT CHANGE

And Now, comes the Debtor, Renee R. Kline, by and through her attorney, who respectfully represents the following:

1. On or about January 9, 2020, Debtor filed for protection under Chapter 13 of the U.S. Bankruptcy Code.
2. This Notice is being filed to notify the Chapter 13 Trustee of the change in mortgage payment amount.
3. Wilmington Savings Fund Society d/b/a Christiana Trust filed a Notice of Mortgage Payment Change. The monthly mortgage payment of **\$530.62** is being **decreased** to **\$483.56** effective **1/1/2023**.

WHEREFORE, the Debtor requests that this Honorable Court permit the Chapter 13 Trustee to immediately make the monthly mortgage payment with the next distribution in the effective amount.

Date: 11/8/2022

Respectfully submitted.
/s/ Rodney D. Shepherd
Rodney D. Shepherd, Esquire
Attorney for the Debtor
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CERTIFICATE OF SERVICE

I, Rodney D. Shepherd, attorney for the Debtor, hereby certifies that a true and correct copy of the Declaration of Mortgage Payment Change was served on the 8th day of November, 2022, by Electronic Filing, upon the following:

Ronda J. Winnecour, Esquire
Chapter 13 Trustee
cmecf@chapter13trusteewdpa.com

Wilmington Savings Fund Society
Attn: Charles Wohlrab, Esquire
cwohrlab@raslg.com

By: /s/ Rodney D. Shepherd

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